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July 18, 2000

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Ms. Rosalyn G. Millman, Administrator
National Highway Traffic Safety Administration
400 Seventh St., S.W.
Washington, DC 20590

000211

Subject: Docket No. NHTSA 00-7013; Notice 1 - 34
Advanced Airbag Final Rule

Dear Ms. Millman:

Please find enclosed the comments of Ferrari S.p.A. to the subject rule.

Sincerely,

Mark A. Recchia
Engineer

Enclosure

cc. Ing. Michela Bruzzone - Ferrari S.p.A.
Ing. Corrado Cingi - Ferrari S.p.A.
Ing. Franco Vaccaro - Fiat Auto S.p.A.
Ing. Fabio Barattelli - Fiat Auto S.p.A.



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July 17, 2000

Ms. Rosalyn G. Millman, Administrator
National Highway Traffic Safety Administration
400 Seventh St., S.W.
Washington, DC 20590

**Subject: Docket No. NHTSA 00-7013; Notice 1
Advanced Airbag Final Rule**

Dear Ms. Millman:

Ferrari S.p.A. hereby submits its comments to the subject advanced airbag rule.

Ferrari strongly supports NHTSA efforts to improve the safety of passenger cars, and commends NHTSA for its effort to issue a final rule that does not burden manufacturers with unnecessary tests.

We believe that most of the SNPRM provisions included in the final rule will help manufacturers in improving the safety and the performances of their restraint systems, and in focusing the restraint system development on the real critical issues. This is especially important for niche and small volume manufacturers as Ferrari, that have limited resources and development funds.

Ferrari would ask NHTSA to take its effort a step further by considering the implications of FMVSS208 requirements, not only within that standard itself but also in their relation with the whole body of existing safety standards.

As you may be aware, the commonality of test speed and test procedure for the frontal (-30° +30° range) crashes of the old FMVSS 208 and FMVSS 301 was a very fine example of rules harmonization, and made it possible for both car manufacturers and NHTSA to reduce the number of development and conformity tests.

The reduction of the test speed from 30 to 25 mph for angled tests in the 208 final rule, that Ferrari strongly supports as fundamental for the development of safer restraint systems, will destroy the synergy that was possible between the 208 and the 301FMVSS, if not followed by a similar reduction in the 301 test speed.

This will waste some of the effort that NHTSA has put into reducing the number of development and self-certification tests, as by obviating belted angled tests.

It will also raise the cost of NHTSA conformity verification tests by requiring separate assessment of the angled 25 mph 208 and angled 30 mph 301 performances, and could even force small volume manufacturers to really develop their systems for 30 mph angled tests in order to reduce the number of development and compliance verification tests.

Ferrari therefore kindly asks NHTSA to treat the 25 mph unbelted angled 208 compliance tests as valid *and sufficient* also for determining 301 angled compliance.

Sincerely,

Michela Bruzzone
Body Design Department